

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

CARL BRASMER, Plaintiff v. 3M COMPANY, et al., Defendants.	CIVIL ACTION NO. 12-2944 (FLW) (DEA)
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**PLAINTIFF’S MOTION FOR LEAVE TO SUBSTITUTE PARTIES AND TO AMEND
THE COMPLAINT**

Now comes Susan Haas, Executrix of the Estate of Carl Brasmer, deceased, and hereby moves this Honorable Court, pursuant to Rules 15 and 25 of the Federal Rules of Civil Procedure, to be substituted as a party plaintiff and for leave to file an amended complaint against all defendants.

This action was commenced on April 4, 2012 in the Superior Court of New Jersey, Middlesex County by Carl Brasmer seeking damages for his development of Mesothelioma. On May 15, 2012 the case was removed to the United States District Court by Defendant Boeing Company.

Carl Brasmer passed away on May 14, 2012, and his executrix moves this Honorable Court to be substituted as party plaintiff and further seeks leave to file an amended complaint. This motion is made pursuant to Civil Rule 25, which provides for the substitution of proper parties in the event a party dies, and pursuant to Civil Rule 15, which states that leave to file an amended pleading shall be freely given when justice requires.

Dated: August 3, 2012

Respectfully Submitted,
Plaintiff Susan Haas

By her attorneys,

/s/ Michael E. McMahon

COHEN, PLACITELLA & ROTH, P.C.
Michael E. McMahon, Esq.
127 Maple Avenue
Red Bank, NJ 07701

CERTIFICATE OF SERVICE

I hereby certify that plaintiff's motion for leave to substitute parties and amend the complaint was served upon all counsel of record via CM/ECF on this 3rd day of August, 2012.

s/ Michael E. McMahon
MICHAEL E. MCMAHON